INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

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Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

September 22, 2003

TO: Interested Parties / Applicant

RE: Phillips Pipe Line Company - East Chicago Terminal / T 089-16208-00326

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).
For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:
(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:
(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and

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PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Phillips Pipe Line Company - East Chicago Terminal
400 East Columbus Drive
East Chicago, Indiana 46312

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-16208-00326	
Issued by: Original signed by Janet G. McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: September 22, 2003 Expiration Date: September 22, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary bulk liquid fuel storage and transfer terminal

Responsible Official:	Vice President
Source Address:	400 East Columbus Drive, Eash Chicago, IN 46312
Mailing Address:	1000 S. Pine, Rm 5655 CB, Ponca City, OK 74602
General Source Phone Number:	(219) 397-6666
SIC Code:	5171
County Location:	Lake
Source Location Status:	Nonattainment for PM10, SO_2 and Ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) 813,624 gallon external floating roof gasoline storage tank, identified as T-201, with primary and secondary seals, constructed in 1939.

(b) One (1) 653,100 gallon external floating roof gasoline storage tank, identified as T-202, with primary and secondary seals, constructed in 1939.

(c) Two (2) 2,956,380 gallon external floating roof gasoline storage tanks, identified as T-801 and T-802, both with primary and secondary seals, both constructed in 1939.

(d) One (1) 2,759,316 gallon external floating roof gasoline storage tank, identified as T-803, with primary and secondary seals, constructed in 1939.

(e) One (1) 2,853,732 gallon external floating roof gasoline storage tank, identified as T-804, with primary and secondary seals, constructed in 1939.

(f) One (1) 3,055,542 gallon external floating roof gasoline/transmix storage tank, identified as T-805, with primary and secondary seals, constructed in 1939.

(g) One (1) 2,843,274 gallon external floating roof gasoline storage tank, identified as T-806, with primary and secondary seals, constructed in 1939.

(h) One (1) 616,938 gallon internal floating roof gasoline storage tank, identified as T-204, with a primary seal, constructed in 1939.

(i) One (1) 630,000 gallon internal floating roof gasoline storage tank, identified as T-207, with a primary seal, constructed in 1946.

(j) One (1) 696,695 gallon internal floating roof gasoline/transmix (a gasoline/distillate oil mixture) storage tank, identified as T-209, with a primary seal, constructed in 1946.

(k) One (1) 739,830 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-208, constructed in 1946.

(l) One (1) 964,824 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-240, constructed in 1968.

(m) One (1) 8,633,646 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2101, constructed in 1955.

(n) One (1) 8,618,190 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2102, constructed in 1955.

(o) One (1) 10,847,382 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2601, originally constructed in 1960 and later modified in 2002.

(p) One (1) 10,835,328 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2602, originally constructed in 1960 and later modified in 2002.

(q) Two (2) 635,040 gallon vertical fixed roof distillate/kerosene storage tanks, identified as T-205 and T-206, constructed in 1939.

(r) One (1) 3,410,988 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-807, constructed in 1939.

(s) Two (2) 15,204 gallon horizontal fixed roof gasoline additive storage tanks, identified as T-1501 and T-1502, both constructed in 1940.

(t) One (1) 1,465,002 gallon domed internal floating roof gasoline storage tank, identified as T-401, with a primary seal, constructed in 1952.

(u) Two (2) 2,857,890 gallon domed internal floating roof gasoline storage tanks, identified as T-809 and T-810, each with a primary seal, both constructed in 1952.

(v) One (1) 2,841,552 gallon domed internal floating roof gasoline/transmix storage tank, identified as T-808, with a primary and seal, constructed in 1952.

(w) One (1) tank truck loading rack (identified as RACK) used to load gasoline, distillate, and ethanol, with a maximum loading capacity of 324,000 gallons of liquid per hour, constructed in 1940 and later reconstructed in 1979, controlled by one (1) natural gas fired Vapor Combustion Unit (VCU), rated at maximum heat input rate of 1.6 MMBtu/hr, installed in 1997, and exhausting through one (1) stack identified as VCU.

(x) One (1) VOC fractionator for separating gasoline and fuel oil of transmix tanks, identified as FRACT, venting 125 cubic feet of VOC vapor per minute during intermittent pressure relief with venting gas being controlled by VCU, and equipped with a 7.0 million million British thermal units per hour natural gas fired reboiler;

(y) VOC emissions from the following operations:
(1) Fugitive VOC emissions from the loading rack, identified as FLRACK.
(2) Gasoline tank cleaning operation, identified as TNKCLN GAS.
(3) Filter change out service for gasoline tanks, identified as FILT1.
(4) Meter proving service, identified as PROVE.

(z) A wastewater handling and treatment system, capable of treating 420,000 gallons of contaminated water per hour, including the following activities:
- (1) Five (5) sumps for wastewater from tank water draw and roof drains;
- (2) One (1) sump for wastewater from loading rack;
- (3) One (1) 379,638 gallon internal floating roof waste water/gasoline storage tank, identified as T-103, constructed in 1939;
- (4) One (1) oil/water separator, identified as Separator No. 1, with a capacity of 1,800 gallons per hour; and
- (5) One (1) air stripper capable of processing 9,000 gallon of water per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

(a) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM , the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, , upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, **,** takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, **,** any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-1-11.1]

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

(a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).

(b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).

(c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).

(d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.

(e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.

(f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.

(g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).

(h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.

(i) The PM_{10} emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

(j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).

(k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, submitted on October 7, 2002.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, , if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

(d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on September 12, 1998.

(b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) (“Regulated pollutant which is used only for purposes of Section 19 of this rule”) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) 813,624 gallon external floating roof gasoline storage tank, identified as T-201, with primary and secondary seals, constructed in 1939.

(b) One (1) 653,100 gallon external floating roof gasoline storage tank, identified as T-202, with primary and secondary seals, constructed in 1939.

(c) Two (2) 2,956,380 gallon external floating roof gasoline storage tanks, identified as T-801 and T-802, both with primary and secondary seals, both constructed in 1939.

(d) One (1) 2,759,316 gallon external floating roof gasoline storage tank, identified as T-803, with primary and secondary seals, constructed in 1939.

(e) One (1) 2,853,732 gallon external floating roof gasoline storage tank, identified as T-804, with primary and secondary seals, constructed in 1939.

(f) One (1) 3,055,542 gallon external floating roof gasoline/transmix storage tank, identified as T-805, with primary and secondary seals, constructed in 1939.

(g) One (1) 2,843,274 gallon external floating roof gasoline storage tank, identified as T-806, with primary and secondary seals, constructed in 1939.

(h) One (1) 616,938 gallon internal floating roof gasoline storage tank, identified as T-204, with a primary seal, constructed in 1939.

(i) One (1) 630,000 gallon internal floating roof gasoline storage tank, identified as T-207, with a primary seal, constructed in 1946.

(j) One (1) 696,695 gallon internal floating roof gasoline/transmix (a gasoline/distillate oil mixture) storage tank, identified as T-209, with a primary seal, constructed in 1946.

(k) One (1) 739,830 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-208, constructed in 1946.

(l) One (1) 964,824 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-240, constructed in 1968.

(m) One (1) 8,633,646 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2101, constructed in 1955.

(n) One (1) 8,618,190 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2102, constructed in 1955.

(o) One (1) 10,847,382 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2601, originally constructed in 1960 and later modified in 2002.

(p) One (1) 10,835,328 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2602, originally constructed in 1960 and later modified in 2002.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Facility Description [326 IAC 2-7-5(15)]:

(q) Two (2) 635,040 gallon vertical fixed roof distillate/kerosene storage tanks, identified as T-205 and T-206, constructed in 1939.

(r) One (1) 3,410,988 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-807, constructed in 1939.

(s) Two (2) 15,204 gallon horizontal fixed roof gasoline additive storage tanks, identified as T-1501 and T-1502, both constructed in 1940.

(t) One (1) 1,465,002 gallon domed internal floating roof gasoline storage tank, identified as T-401, with a primary seal, constructed in 1952.

(u) Two (2) 2,857,890 gallon domed internal floating roof gasoline storage tanks, identified as T-809 and T-810, each with a primary seal, both constructed in 1952.

(v) One (1) 2,841,552 gallon domed internal floating roof gasoline/transmix storage tank, identified as T-808, with a primary and seal, constructed in 1952.

(w) Gasoline tank cleaning operation, identified as TNKCLN GAS.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Hazardous Air Pollutants (HAPs) [40 CFR Part 63.420] [326 IAC 20]

The Permittee shall:

(a) Limit amount of material handled by all storage tanks to the following:
  (1) 2,007 million gallons of gasoline per twelve (12) consecutive month period with compliance determined at the end of each month, with Tanks T-801 -T-810 (excluding T-807) handling more than 50% of throughput; and
  (2) 789 million gallons of distillate fuel and all other non-gasoline materials per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) Limit gasoline tank cleaning to 4 cleanings per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to VOC emissions of 13.5 tons per year and 432 hours of gasoline tank cleaning per year.

Compliance with above throughput limits in conjunction with the requirements of Conditions D.2.1 and D.3.1 shall limit source wide emissions of worst case single HAP and total HAPs to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the requirements of 40 CFR Part 63.420, and Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-3]

Pursuant to 326 IAC 8-4-3, Tank Nos. T-103, T-201, T-202, T-204, T-207, T-209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809 and T-810 are subject to the following:

(a) For External Fixed Roof Tanks

(1) The facility must be retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with equally effective alternative control which has been approved.

(2) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.

(3) All openings, except stub drains, are equipped with covers, lids, or seals such that:

(A) the cover, lid, or seal is in the closed position at all times except when in actual use;
(B) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
(C) rim vents, if provided are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

(b) For External Floating Roof Tanks

The owner of a facility subject to this subsection shall not store a petroleum liquid in that facility unless:

(1) The facility has been fitted with:

(A) a continuous secondary seal extending from the floating roof to the tank wall (rim-mounted secondary seal); or
(B) a closure or other device approved by the commissioner which is equally effective.

(2) All seal closure devices meet the following requirements:

(A) there are no visible holes, tears, or other openings in the seal(s) or seal fabric;
(B) the seal(s) are intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall;

(C) for vapor mounted primary seals, the accumulated gap area around the circumference of the secondary seal where a gap exceeding one-eighth (1/8) inch exists between the secondary seal and the tank wall shall not exceed 1.0 square inch per foot of tank diameter. There shall be no gaps exceeding on-half (½) inch between the secondary seal and the tank wall of welded tanks and no gaps exceeding one (1) inch between the secondary seal and the tank wall of riveted tanks.

(3) All openings in the external floating roof, except for automatic bleeder vents, rim space vents, and leg sleeves are:

(A) equipped with covers, seals, or lids in the closed position except when the openings are in actual use; and
(B) equipped with projections into the tank which remain below the liquid surface at all times.

(4) Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;

(5) Rim vents are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting; and

(6) Emergency roof drains are provided with slotted membrane fabric covers or equivalent covers which cover at least ninety percent (90%) of the area of the opening.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-9-4]

The eight (8) VOC Storage tanks identified as T-103, T-201, T-202, T-204, T-207, T-209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809, T-810 T-205, T-206, T-208, T-240, T-807, T-2101, T-2102, T-2601, and T-2602, are subject to this rule. Pursuant to this rule, the Permittee shall equip each tank with one (1) of the following:

(a) At the time of the next scheduled cleaning, but not later than ten (10) years after May 1, 1996, an internal floating roof meeting the following specifications:

(i) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

(ii) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
(A) A foam or liquid -filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid mounted seal means a foam - or liquid filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
(B) Two seals mounted one above the others so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor mounted, but both must be continuous.

(iii) Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

(iv) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

(v) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

(vi) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

(vii) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

(viii) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

(ix) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

(b) At the time of the next scheduled cleaning, but not later than ten (10) years after May 1, 1996, an external floating roof meeting the following specifications:

(i) Each external floating roof shall be equipped with a closure device between the wall of the vessel and the roof edge. The closure device shall consist of two (2) seals, one (1) above the other. The lower seal shall be referred to as the primary seal; the upper seal shall be referred to as the secondary seal.

(ii) Except as provided in 326 IAC 8-9-5(c)(4), the primary seal shall completely cover the annular space between the edge of the floating roof and vessel wall and shall be either a liquid-mounted seal or a shoe seal.

(iii) The secondary seal shall completely cover the annular space between the external floating roof and the wall of the vessel in a continuous fashion except as allowed in 326 IAC 8-9-5(c)(4).

(iv) Except for automatic bleeder vents and rim space vents, each opening in a noncontact external floating roof shall provide a projection below the liquid surface.

(v) Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof shall be equipped with a gasketed cover, seal, or lid that shall be maintained in a closed position at all times, without visible gap, except when the device is in actual use.

(vi) Automatic bleeder vents shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

(vii) Rim vents shall be set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. Automatic bleeder vents and rim space vents shall be gasketed.

(viii) Each emergency roof drain shall be provided with a slotted membrane fabric cover that covers at least ninety percent (90%) of the area of the opening.

(ix) The roof shall be floating on the liquid at all times, for example, off the roof leg supports, except when the vessel is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.

(c) At the time of the next scheduled cleaning, but not later than ten (10) years after May 1, 1996, a closed vent system and control device meeting the following specifications:

(i) The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in part 60, subpart VV, 40 CFR 60.485(b).

(ii) The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements (40 CFR 60.18) of the General Provisions.

(d) A system equivalent to those described in paragraphs a, b and c as provided in 326 IAC 8-9-4.

(e) The testing procedures are required under 326 IAC 8-9-5. The record keeping and reporting are required under 326 IAC 8-9-6.

(f) On or before May 1, 1996, the Permittee of each vessel with a capacity greater than or equal to thirty-nine thousand (39,000) gallons, that stores VOL with a maximum true vapor pressure greater than or equal to eleven and one-tenth (11.1) psia shall equip each vessel with a closed vent system meeting the standards of paragraph (c).

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Testing and Procedures [326 IAC 8-9-5]

The eight (8) VOC Storage tanks identified as T-103, T-201, T-202, T-204, T-207, T-209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809, T-810 T-205, T-206, T-208, T-240, T-807, T-2101, T-2102, T-2601, and T-2602, are subject to 326 IAC 8-9-5. Pursuant to this rule, the Permittee of each storage tank shall do the following:

(a) Except as provided in section 326 IAC 8-9-4(a)(2), the Permittee of each vessel equipped with an internal floating roof shall meet the following requirements.

(1) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the Permittee shall repair the items before filling the storage vessel.

(2) For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator (IDEM) in the inspection report required in 326 IAC 8-9-6(c)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

(3) For vessels equipped with both primary and secondary seals:
(i) Visually inspect the vessel as specified in paragraph (4) of this section at least every 5 years; or
(ii) Visually inspect the vessel as specified in paragraph (2) of this section.

(4) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (2) and (3)(ii) of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph (3)(i) of this section.

(5) Notify the Administrator (IDEM) in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a) and (d) of this section to afford the Administrator (IDEM) the opportunity to have an observer present. If the inspection required by paragraph (d) of this section is not planned and the Permittee could not have known about the inspection 30 days in advance or refilling the tank, the Permittee shall notify the Administrator (IDEM) at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator (IDEM) at least 7 days prior to the refilling.

(b) Except as provided in 326 IAC 8-9-4(a)(3), the Permittee of each vessel equipped with an external floating roof shall meet the following requirements:

(1) Determine the gap areas and maximum gap widths between the primary seal and the wall of the vessel and between the secondary seal and the wall of the vessel according to the following frequency:

(A) Measurements of gaps between the vessel wall and the primary seal (seal gaps) shall be performed during the hydrostatic testing of the vessel or within sixty (60) days of the initial fill with VOL and at least once every five (5) years thereafter.
(B) Measurements of gaps between the vessel wall and the secondary seal shall be performed within sixty (60) days of the initial fill with VOL and at least once per year thereafter.
(C) If any source ceases to store VOL for a period of one (1) year or more, subsequent introduction of VOL into the vessel shall be considered an initial fill for purposes of this subdivision.

(2) Determine gap widths and areas in the primary and secondary seals individually by the following procedures:
(A) Measure seal gaps, if any, at one (1) or more floating roof levels when the roof is floating off the roof leg supports.
(B) Measure seal gaps around the entire circumference of the vessel in each place where a one-eighth (**c**) inch diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the wall of the vessel and measure the circumferential distance of each such location.
(C) The total surface area of each gap described in clause (B) shall be determined by using probes of various widths to measure accurately the actual distance from the vessel wall to the seal and multiplying each such width by its respective circumferential distance.

(3) Add the gap surface area of each gap location for the primary seal and the secondary seal individually and divide the sum for each by the nominal diameter of the vessel and compare each ratio to the respective standards in subdivision (4).

(4) Make necessary repairs or empty the vessel within forty-five (45) days of identification of seals not meeting the requirements listed in clauses (A) and (B) as follows:
(A) The accumulated area of gaps between the vessel wall and the mechanical shoe or liquid-mounted primary seal shall not exceed ten (10) square inches per foot of vessel diameter, and the width of any portion of any gap shall not exceed one and five-tenths (1.5) inches. There shall be no holes, tears, or other openings in the shoe, seal fabric, or seal envelope.
(B) The secondary seal shall meet the following requirements:
(i) The secondary seal shall be installed above the primary seal so that it completely covers the space between the roof edge and the vessel wall except as provided in subdivision (2)(C).

(ii) The accumulated area of gaps between the vessel wall and the secondary seal used in combination with a metallic shoe or liquid-mounted primary seal shall not exceed one (1) square inch per foot of vessel diameter, and the width of any portion of any gap shall not exceed five-tenths (0.5) inch. There shall be no gaps between the vessel wall and the secondary seal when used in combination with a vapor-mounted primary seal.

(iii) There shall be no holes, tears, or other openings in the seal or seal fabric.

(C) If a failure that is detected during inspections required in subdivision (1) cannot be repaired within forty-five (45) days and if the vessel cannot be emptied within forty-five (45) days, a thirty (30) day extension may be requested from the department in the inspection report required in 326 IAC 8-9-6(d)(3). Such extension request must include a demonstration of unavailability of alternate storage capacity and a specification of a schedule that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

(5) Notify the department thirty (30) days in advance of any gap measurements required by subdivision (1) to afford the department the opportunity to have an observer present.

(6) Visually inspect the external floating roof, the primary seal, secondary seal, and fittings each time the vessel is emptied and degassed. For all visual inspections, the following requirements apply:

(A) If the external floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal fabric, the Permittee shall repair the items as necessary so that none of the conditions specified in this clause exist before filling or refilling the vessel with VOL.

(B) The Permittee shall notify the department in writing at least thirty (30) days prior to the filling or refilling of each vessel to afford the department the opportunity to inspect the vessel prior to the filling. If the inspection required by this subdivision is not planned and the Permittee could not have known about the inspection thirty (30) days in advance of refilling the vessel, the Permittee shall notify the department at least seven (7) days prior to the refilling of the vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the department at least seven (7) days prior to the refilling.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific Compliance Monitoring Requirements applicable to these emission units.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be compiled monthly and shall be complete and sufficient to establish compliance with the usage limits and/or the VOC and HAP emission limits established in Condition D.1.1.

(1) The amount of total petroleum products (gasoline) and distillate throughput per month from storage tanks. Records shall include those documents as necessary to verify the type and amount of throughput. Examples may include, but are not limited to, shipping documents, bills of loading, purchase orders, pipeline schedules, throughput summaries, Material Safety Data Sheets, and/or other records that document volumes of the specific regulated material transferred.

(2) The number of gasoline tank cleanings per twelve (12) consecutive month period.

(3) Total amounts of petroleum products (gasoline) and distillate throughput for 12 consecutive month period from storage tanks.

(b) The Permittee shall comply with the record keeping requirements of 326 IAC 8-4-3. The following records are required for tank Nos. T-103, T-201, T-202, T-204, T-207, T209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809 and T-810:

(1) The types of volatile petroleum liquids stored,

(2) The maximum true vapor pressure of the liquids stored, and

(3) The results of the inspections performed on the tanks.

Such records will be maintained for a period of two (2) years and shall be made available to the commissioner upon written request.

(c) Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels), all storage tanks identified as T-1501 and T-1502, T-103, T-201, T-202, T-204, T-207, T-209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809, T-810 T-205, T-206, T-208, T-240, T-807, T-2101, T-2102, T-2601, and T-2602 are subject to the following record keeping requirements.

(1) The Permittee shall keep copies of all records required by this section, except for the record required by paragraph (2) below, for at least two (2) years. The record required by paragraph (2) below will be kept for the life of the source.

(2) The Permittee shall keep readily accessible records showing the dimension of each storage vessel, identification number and an analysis showing the capacity of each storage vessel.

(3) Except as provided in 326 IAC 8-9-6(f) and (g), the Permittee of each storage vessel either with a design capacity greater than or equal to thirty-nine thousand (39,000) gallons storing a liquid with a maximum true vapor pressure greater than or equal to five-tenths (0.5) pound per square inch absolute (psia) but less than seventy-five hundredths (0.75) psia shall maintain a record of the maximum true vapor pressure of the VOL, a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

(4) Except as provided in paragraph 326 IAC 8-9-6(g), the Permittee of each storage vessel either with a design capacity greater than or equal to thirty-nine thousand (39,000) gallons storing a liquid with a maximum true vapor pressure that is normally less than 0.75 psia shall maintain a record and notify the Administrator (IDEM) within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each

volume range.

(d) Pursuant to 40 CFR Part 60.110b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels), storage tanks identified as Nos. 2601 and 2602, with a storage capacity of greater than 151 cubic meters and storing only volatile organic compounds with a maximum true vapor pressure less than 3.5 kPa., are subject to following recordkeeping requirements.
The Permittee shall maintain permanent records at the source in accordance with (1) through (2) below:

(1) the dimension of the storage vessel; and

(2) an analysis showing the capacity of the storage vessel.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Record Keeping Requirements [326 IAC 8-9-6]

The Permittee shall comply with the record keeping requirements in 326 IAC 8-9-6 (for Tanks T-103, T-201, T-202, T-204, T-207, T-209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809, T-810 T-205, T-206, T-208, T-240, T-807, T-2101, T-2102, T-2601, and T-2602), and shall maintain the following records for a minimum of three (3) years.

(a) Pursuant to Condition D.1.3 and 326 IAC 8-9-6, the Permittee of the internal floating roof gasoline storage tanks shall keep copies of all reports and records for at least three (3) years. The Permittee of the internal floating roof tanks shall meet the following requirements:

(1) Keep a record of each inspection performed as required by 326 IAC 8-9-5(b)(1) through 326 IAC 8-9-5(b)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

(2) If any of the conditions described in 326 IAC 8-9-5(b)(2) are detected during the annual visual inspection, a record shall be maintained and a report shall be furnished to the department within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

(3) After each inspection required by 326 IAC 8-9-5(b)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 326 IAC 8-9-5(b)(3)(B), a record shall be maintained and a report shall be furnished to the department within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 326 IAC 8-9-4(a)(1)(A), 326 IAC 8-9-4(a)(2)(A), or 326 IAC 8-9-5(b), and list each repair made.

(b) Pursuant to Condition D.1.3 and 326 IAC 8-9-6, the Permittee of the external floating roof gasoline storage tanks shall keep copies of all reports and records for at least three (3) years. The Permittee of the external floating roof tanks shall meet the following requirements:

(1) Keep a record of each gap measurement performed as required by 326 IAC 8-9-5(c). Each record shall identify the vessel in which the measurement was made and shall contain the date of measurement, the raw data obtained in the measurement and the calculations described in 326 IAC 8-9-5(c)(2) and (c)(3).

(2) Within sixty (60) days of performing the seal gap measurements required by 326 IAC 8-9-5(c)(1), furnish the department with a report that contains the date of measurement, the raw data obtained in the measurement, and the calculations described in 326 IAC 8-9-5(c)(2) and (c)(3).

(3) After each seal gap measurement that detects gaps exceeding the limitations specified in 326 IAC 8-9-5(c), submit a report to the department within thirty (30) days of the inspection. The report shall identify the vessel and contain the information specified in subdivision (2) and the date the vessel was emptied or the repairs made and date of repair.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(x) One (1) tank truck loading rack (identified as RACK) used to load gasoline, distillate, and ethanol, with a maximum loading capacity of 324,000 gallons of liquid per hour, constructed in 1940 and later reconstructed in 1979, controlled by one (1) natural gas fired Vapor Combustion Unit (VCU), rated at maximum heat input rate of 1.6 MMBtu/hr, installed in 1997, and exhausting through one (1) stack identified as VCU.

(y) One (1) VOC fractionator for separating gasoline and fuel oil of transmix tanks, identified as FRACT, venting 125 cubic feet of VOC vapor per minute during intermittent pressure relief with venting gas being controlled by VCU, and equipped with a 7.0 million million British thermal units per hour natural gas fired reboiler;

(z) VOC emissions from the following operations:
(1) Fugitive VOC emissions from the loading rack, identified as FLRACK.
(2) Filter change out service for gasoline tanks, identified as FILT1.
(3) Meter proving service, identified as PROVE.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Hazardous Air Pollutants (HAPs) [40 CFR Part 63.420] [326 IAC 20]

The Permittee shall:

(a) Limit amount of material handled by loading rack to the following:
(1) 320 million gallons of gasoline per twelve (12) consecutive month period with compliance determined at the end of each month;
(2) 320 million gallons of distillate fuel per twelve (12) consecutive month period with compliance determined at the end of each month; and
(3) 9.142 million gallons of ethanol per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) Operate the vapor combustion system, which has a capture efficiency of 98.7% and will emit no more than 35 mg VOC per liter of gasoline loaded, at all times when gasoline is being loaded at the loading rack.

(c) Limit the venting of VOC from the fractionator (FRACT) to 2,760 minutes per twelve (12) consecutive month period with compliance determined at the end of each month (this is equivalent to VOC emissions of 0.12 tons per year and VOC emissions from the Fractionator being controlled by vapor combustion unit (VCU) with capture efficiency of 98.7%).

Compliance with above limits in conjunction with the requirements of Conditions D.1.1 and D.3.1 shall limit source wide emissions of worst case single HAP and total HAPs to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the requirements of 40 CFR Part 63.420, and Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

Pursuant to 326 IAC 8-4-4, the Permittee shall not permit the loading of gasoline into any transport unless:

(a) The gasoline loading equipment is equipped with a vapor control system in good working order, which will control VOC emissions to the atmosphere from the equipment being controlled to no more than 80 milligrams per liter of gasoline loaded.

(b) Displaced vapors and gases are vented only to the vapor control system.

(c) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

(d) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

If employees of the owner of the source are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The owner of the source shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this rule.

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-4-9]

Pursuant to 326 IAC 8-4-9, the Permittee shall:

(a) Ensure the following requirements are met, before allowing a gasoline transport subject to this rule to be filled or emptied :

(1) The gasoline transport is tested annually according to test procedures consistent with Appendix A of “Control of Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems”, EPA-450/2-78-051, or equivalent procedure approved by the commissioner.

(2) The gasoline transport sustains a pressure change of no more than seven hundred fifty (750) pascals in five (5) minutes when pressurized to a gauge pressure of four thousand five hundred (4,500) pascals or evacuated to a gauge pressure of one thousand five hundred (1,500) pascals during the testing required in (a) (1).

(3) The gasoline transport is repaired by the owner or operator of the transport and retested within fifteen (15) days of testing if it does not meet the criteria of (a) (2).

(4) The gasoline transport displays a sticker which shows the date that the gasoline tank truck last passed the test required in (a) (1) through (a) (2). Such sticker shall be displayed near the Department of Transportation Certification Plate required by 49 CFR 178.340-10b.

(b) The owner of the transport shall be responsible for compliance with subsection (a). The Permittee shall take all reasonable steps to ensure that transports loading at its facility comply with subsection (b), and shall, in all cases when its employees are present to supervise or perform loading, be responsible for compliance with (a)(4).

(c) The Permittee, which owns and operates a vapor control system subject to this rule shall:

(1) Design and operate the applicable system and the gasoline loading equipment in a manner that prevents:

(A) gauge pressure from exceeding four thousand five hundred (4,500) pascals and a vacuum from exceeding one thousand five hundred (1,500) pascals in the gasoline tank truck;

(B) a reading equal to or greater than one hundred percent (100%) of the lower explosive limit (LEL, measured as propane) at two and five-tenths (2.5) centimeters from all points on the perimeter of a potential leak source when measured by the method referenced in Appendix B of "Control of Organic Compound leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA 450/2-78-051, or an equivalent procedure approved by IDEM during loading or unloading operations; and

(C) avoidable visible liquid leaks during loading or unloading operations.

(2) Repair and retest a vapor collection or control system that exceeds the limits in (c) (1) within fifteen (15) days.

(d) The IDEM, OAQ staff may, at any time monitor a gasoline tank truck, vapor balance referenced, to confirm continuing compliance with subsection (a) or (b).

(e) If IDEM, OAQ allows alternative test procedures in subsection (a)(1) or (c)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.5 VOC and HAPs

The Vapor Combustion Unit (VCU) for VOC and HAPs control shall be in operation at all times, when the loading rack (RACK) is transferring gasoline or when the fractionator (FRACT) is venting vapor, and exhausting to the outside atmosphere.

D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between between June 8, 2005 and December 8, 2005 which corresponds to five (5) years since the latest valid stack test plus one hundred and eighty (180) days, in order to demonstrate compliance with Conditions D.2.1(b) and D.2.2, the Permittee shall perform VOC testing at the vapor combustion unit (VCU) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C-Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.7 Vapor Combustion Unit (VCU) Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64.7]

(a) The vapor combustion unit (VCU) shall operate at all times the loading rack (RACK) is transferring gasoline or when the fractionator (FRACT) is in operation. The permittee shall install and maintain a monitor to detect the presence of a pilot flame. The presence of a pilot flame shall be monitored using a heat-sensing device at all times when the vapors are being vented to the VCU. The monitor shall be equipped with a computer system which will not allow for the operation of the loading rack and the fractionator (FRACT) when the presence of a flame is not detected during periods when gasoline vapors are being vented to the VCU.

Compliance with the above monitoring condition shall also satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring.

(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.2.8 Daily Visible Checks for Liquid Leaks [40 CFR 64.7]

(a) Daily checks for liquid leaks during loading or unloading operations of the Loading Rack, the vapor collection system and the vapor recovery unit (VRU) shall be performed during normal daylight operations when the facility is in operation. A trained employee will record any visible liquid leaks and the date of such leaks.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(f) All checks for visible liquid leaks made to comply with this condition shall be conducted in accordance with 326 IAC 8-4-9.

Compliance with the above monitoring condition shall also satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.1 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be compiled monthly and shall be complete and sufficient to establish compliance with the usage limits and/or the VOC and HAP emission limits established in Condition D.2.1.

(1) The amount of petroleum products (gasoline), distillates and ethanol loaded each month. Records shall include those documents as necessary to verify the type and amount of throughput. Examples may include, but are not limited to, shipping documents, bills of loading, purchase orders, pipeline schedules, throughput summaries, Material Safety Data Sheets, and/or other records that document volumes of the specific regulated material transferred.

(2) The time, date and total length in minutes of VOC venting from the fractionator (FRACT) per month.

(3) Total amounts of petroleum products (gasoline) and distillate and ethanol throughput for 12 consecutive month period from storage tanks.

(b) To document compliance with Condition D.2.3, the Permittee shall maintain records of all the required parameters listed in Condition D.2.3.

(c) To document compliance with Condition D.2.8, the Permittee shall maintain records of daily checks for liquid leaks of the Loading Rack and VCU stack exhaust.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(aa) A wastewater handling and treatment system, capable of treating 420,000 gallons of contaminated water per hour, including the following activities:
- (1) Five (5) sumps for wastewater from tank water draw and roof drains;
- (2) One (1) sump for wastewater from loading rack;
- (3) One (1) 379,638 gallon internal floating roof waste water/gasoline storage tank, identified as T-103, constructed in 1939;
- (4) One (1) oil/water separator, identified as Separator No. 1, with a capacity of 1,800 gallons per hour; and
- (5) One (1) air stripper capable of processing 9,000 gallon of water per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Hazardous Air Pollutants (HAPs) [40 CFR Part 63.420] [326 IAC 20]

The Permittee shall limit the wastewater handled and treated to 31.1 million gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with above limits in conjunction with the requirements of Conditions D.1.1 and D.2.1 shall limit source wide emissions of worst case single HAP and total HAPs to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the requirements of 40 CFR Part 63.420, and Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations, do not apply.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.2 Record Keeping Requirements

(a) To document compliance with condition D.3.1, the Permittee shall maintain records of the actual monthly throughput wastewater handled and treated.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.3 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Phillips Pipe Line Company - East Chicago Terminal
Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Mailing Address: 1000 S. Pine, Rm 5655 CB, Ponca City, OK 74602
Part 70 Permit No.: T089-16208-00326

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Phillips Pipe Line Company - East Chicago Terminal
Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Mailing Address: 1000 S. Pine, Rm 5655 CB, Ponca City, OK 74602
Part 70 Permit No.: T089-16208-00326

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Phillips Pipe Line Company - East Chicago Terminal
Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Mailing Address: 1000 S. Pine, Rm 5655 CB, Ponca City, OK 74602
Part 70 Permit No.: T089-16208-00326
Facility: Storage Tanks
Parameter: Gallons of Liquid Fuel Handled and Hours of Gasoline Tank Cleaning
Limit:
(1) 2,007 million gallons of gasoline per twelve (12) consecutive month period with compliance determined at the end of each month, with Tanks T-801 - T-810 (excluding T-807) handling 50% of the throughput;
(2) 789 million gallons of distillate fuel and all other non-gasoline materials per twelve (12) consecutive month period with compliance determined at the end of each month. rolled on a monthly basis; and
(3) Limit gasoline tank cleaning to 4 cleanings per twelve (12) consecutive month period with compliance determined at the end of each month (equivalent to VOC emissions of 13.5 tons per year and 432 hours of gasoline tank cleaning per year)

YEAR: _____

	Month	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Gasoline Handled by T-801 - T-810 (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Total Gasoline Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Non-Gasoline Fuels Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Number of Gasoline Tank Cleaning	Month 1			
	Month 2			
	Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Phillips Pipe Line Company - East Chicago Terminal
Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Mailing Address: 1000 S. Pine, Rm 5655 CB, Ponca City, OK 74602
Part 70 Permit No.: T089-16208-00326
Facility: Loading Rack (RACK) and Fractionator (FRACT)
Parameter: Gallons of Liquid Fuel Handled
Limit:
(1) 320 million gallons of gasoline per twelve (12) consecutive month period with compliance determined at the end of each month.
(2) 320 million gallons of distillate fuel per twelve (12) consecutive month period with compliance determined at the end of each month.
(3) 9.142 million gallons of ethanol per twelve (12) consecutive month period with compliance determined at the end of each month.
(4) Venting of VOC from the fractionator (FRACT), for no more than 2,760 minutes per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

	Month	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Gasoline Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Distillate Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Ethanol Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Fractionator VOC Venting (minutes)	Month 1			
	Month 2			
	Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Phillips Pipe Line Company - East Chicago Terminal
Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Mailing Address: 1000 S. Pine, Rm 5655 CB, Ponca City, OK 74602
Part 70 Permit No.: T089-16208-00326
Facility: Wastewater Treatment System
Parameter: Gallons of Wastewater Handled and Treated
Limit: 31.1 millions gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

	Month	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Wastewater Handled and Treated (1000 gallons)	Month 1			
	Month 2			
	Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Phillips Pipe Line Company - East Chicago Terminal
Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Mailing Address: 1000 S. Pine, Rm 5655 CB, Ponca City, OK 74602
Part 70 Permit No.: T089-16208-00326

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ____________________________________

Title/Position: ____________________________________

Date: ____________________________________

Phone: ____________________________________

Attach a signed certification to complete this report.

(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTVOP.dot 9/16/03

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document (TSD) for a Part 70 Permit Renewal

Source Name: Phillips Pipe Line Company - East Chicago Terminal
Source Location: 400 East Columbus Drive, East Chicago, IN 46312
County: Lake
SIC Code: 5171
Operation Permit No.: T089-16208-00326
Permit Reviewer: Adeel Yousuf / EVP

On July 11, 2003, the Office of Air Quality (OAQ) had a notice published in The Post Tribune in Merrillville, Indiana, stating that Phillips Pipe Line Company - East Chicago Terminal had applied for a Part 70 renewal Permit relating to the operation of a stationary bulk liquid fuel storage and transfer terminal. The notice also stated that OAQ proposed to issue a Part 70 renewal Permit for this installation and provided information on how the public could review the proposed Part 70 renewal Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 renewal Permit should be issued as proposed.

On July 29, 2003, D. C. (Clint) Gill, Jr. of Phillips Pipe Line Company - East Chicago Terminal submitted comments on the proposed Part 70 renewal Permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

Conditions D.2.1(c) and D.2.9(a)(2) - The requirement for calculating the fractionator VOC emissions monthly and maintaining a 12-month rolling total should be changed to monitoring the venting minutes as required in the previous permit. As reflected in the permit application, 2,760 minutes is equivalent to 0.12 tpy of VOC and the system is already in place to track the venting minutes.

Response 1

IDEM, OAQ has determined that the source has a monitoring system such as time meter in place to track the number of minutes while the fractionator (FRACT) is vented to the VCU. Based on this, IDEM, OAQ has decided to revise Conditions D.2.1(c) and D.2.9(a)(2) to monitor the venting minutes for the fractionator instead of calculating and reporting the VOC emissions. The time limit will be enforceable with the use of time meter and by reporting the number of minutes quarterly.

D.2.1 Hazardous Air Pollutants (HAPs) [40 CFR Part 63.420] [326 IAC 20]

The Permittee shall:

(c) Limit the **venting of** VOC ~~emissions~~ from the fractionator (FRACT) to ~~0.12 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to VOC emissions venting to the fractionator for~~ 2,760 minutes per ~~year~~ **twelve (12) consecutive month period with compliance determined at the end of each month (this is equivalent to VOC emissions of 0.12 tons per year** and ~~based on~~ VOC emissions from the Fractionator being controlled by vapor combustion unit (VCU) with capture efficiency of 98.7%**)**.

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.1 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be compiled monthly and shall be complete and sufficient to establish compliance with the usage limits and/or the VOC and HAP emission limits established in Condition D.2.1.

(1) The amount of petroleum products (gasoline), distillates and ethanol loaded each month. Records shall include those documents as necessary to verify the type and amount of throughput. Examples may include, but are not limited to, shipping documents, bills of loading, purchase orders, pipeline schedules, throughput summaries, Material Safety Data Sheets, and/or other records that document volumes of the specific regulated material transferred.

(2) The ~~VOC emissions from the fractioinator per twelve (12) consecutive month period.~~ **time, date and total length in minutes of VOC venting from the fractionator (FRACT) per month.**

Part 70 Quarterly Report Form has also been revised to reflect the changes.

Source Name: Phillips Pipe Line Company - East Chicago Terminal
Source Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Mailing Address: 1000 S. Pine, Rm 5655 CB, Ponca City, OK 74602
Part 70 Permit No.: T089-16208-00326
Facility: Loading Rack (RACK) and Fractionator (FRACT)
Parameter: Gallons of Liquid Fuel Handled
Limit:

(1) 320 million gallons of gasoline per twelve (12) consecutive month period with compliance determined at the end of each month.

(2) 320 million gallons of distillate fuel per twelve (12) consecutive month period with compliance determined at the end of each month.

(3) 9.142 million gallons of ethanol per twelve (12) consecutive month period with compliance determined at the end of each month.

(4) ~~Limit the VOC emissions from the fractionator (FRACT) to 0.12 tons per twelve (12) consecutive month period with compliance determined at the end of each month (equivalent to VOC emissions venting to the fractionator for 2,760 minutes per year)~~ **Venting of VOC from the fractionator (FRACT), for no more than 2,760 minutes per twelve (12) consecutive month period with compliance determined at the end of each month.**

YEAR: _____

	Month	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Gasoline Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Distillate Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Ethanol Handled (1000 gallons)	Month 1			
	Month 2			
	Month 3			
Fractionator VOC ~~emissions~~ **Venting (minutes)**	Month 1			
	Month 2			
	Month 3			

Comment 2

Condition D.2.6 - Remove the requirement to test the VCU every 5 years. This permit condition should be worded the same as 326 IAC 2-1.1-11, which requires a stack test at the request of the commissioner.

Response 2

Testing requirement for the vapor combustion unit (VCU) is in the permit in order to ensure continuous compliance with the VOC emission limit of 35 mg VOC per liter of gasoline loaded. Testing requirement also validates the VCU capture efficiency of 98.7% which is required to limit the single HAP and combined HAPs emissions to less than 10 and 25 tons per year, respectively, to render the requirements of 40 CFR Part 63.420, Subpart R not applicable. Therefore, pursuant to 326 IAC 2-1.1-11, IDEM, OAQ has determined for this particular emission source that the minimum frequency needed to ensure continued compliance, as demonstrated through testing, is once every five years. There will be no changes to this condition in the final permit due to this comment.

Upon further review, the OAQ has decided to make the following revisions to the permit:

Condition B.8 (Compliance with Permit Conditions) has been removed from the B section and has been added to the Part 70 title page instead.

PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Phillips Pipe Line Company - East Chicago Terminal
400 East Columbus Drive
East Chicago, Indiana 46312

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

~~B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]~~

~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:~~

~~(1) Enforcement action;~~

~~(2) Permit termination, revocation and reissuance, or modification; or~~

~~(3) Denial of a permit renewal application.~~

~~(b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.~~

~~(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.~~

~~(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.~~

All the preceding conditions in section B have been re-numbered accordingly.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name: Phillips Pipe Line Company - East Chicago Terminal
Source Location: 400 East Columbus Drive, East Chicago, IN 46312
County: Lake
SIC Code: 5171
Operation Permit No.: T089-16208-00326
Permit Reviewer: Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Phillips Pipe Line Company - East Chicago Terminal relating to the operation of a stationary bulk liquid fuel storage and transfer terminal.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) 813,624 gallon external floating roof gasoline storage tank, identified as T-201, with primary and secondary seals, constructed in 1939.

(b) One (1) 653,100 gallon external floating roof gasoline storage tank, identified as T-202, with primary and secondary seals, constructed in 1939.

(c) Two (2) 2,956,380 gallon external floating roof gasoline storage tanks, identified as T-801 and T-802, both with primary and secondary seals, both constructed in 1939.

(d) One (1) 2,759,316 gallon external floating roof gasoline storage tank, identified as T-803, with primary and secondary seals, constructed in 1939.

(e) One (1) 2,853,732 gallon external floating roof gasoline storage tank, identified as T-804, with primary and secondary seals, constructed in 1939.

(f) One (1) 3,055,542 gallon external floating roof gasoline/transmix storage tank, identified as T-805, with primary and secondary seals, constructed in 1939.

(g) One (1) 2,843,274 gallon external floating roof gasoline storage tank, identified as T-806, with primary and secondary seals, constructed in 1939.

(h) One (1) 616,938 gallon internal floating roof gasoline storage tank, identified as T-204, with a primary seal, constructed in 1939.

(i) One (1) 630,000 gallon internal floating roof gasoline storage tank, identified as T-207, with a primary seal, constructed in 1946.

(j) One (1) 696,695 gallon internal floating roof gasoline/transmix (a gasoline/distillate oil mixture) storage tank, identified as T-209, with a primary seal, constructed in 1946.

(k) One (1) 739,830 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-208, constructed in 1946.

(l) One (1) 964,824 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-240, constructed in 1968.

(m) One (1) 8,633,646 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2101, constructed in 1955.

(n) One (1) 8,618,190 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2102, constructed in 1955.

(o) One (1) 10,847,382 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2601, originally constructed in 1960 and later modified in 2002.

(p) One (1) 10,835,328 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-2602, originally constructed in 1960 and later modified in 2002.

(q) Two (2) 635,040 gallon vertical fixed roof distillate/kerosene storage tanks, identified as T-205 and T-206, constructed in 1939.

(r) One (1) 3,410,988 gallon vertical fixed roof distillate/kerosene storage tank, identified as T-807, constructed in 1939.

(s) Two (2) 15,204 gallon horizontal fixed roof gasoline additive storage tanks, identified as T-1501 and T-1502, both constructed in 1940.

(t) One (1) 1,465,002 gallon domed internal floating roof gasoline storage tank, identified as T-401, with a primary seal, constructed in 1952.

(u) Two (2) 2,857,890 gallon domed internal floating roof gasoline storage tanks, identified as T-809 and T-810, each with a primary seal, both constructed in 1952.

(v) One (1) 2,841,552 gallon domed internal floating roof gasoline/transmix storage tank, identified as T-808, with a primary and seal, constructed in 1952.

(w) Gasoline tank cleaning operation, identified as TNKCLN GAS.

(x) One (1) tank truck loading rack (identified as RACK) used to load gasoline, distillate, and ethanol, with a maximum loading capacity of 324,000 gallons of liquid per hour, constructed in 1940 and later reconstructed in 1979, controlled by one (1) natural gas fired Vapor Combustion Unit (VCU), rated at maximum heat input rate of 1.6 MMBtu/hr, installed in 1997, and exhausting through one (1) stack identified as VCU.

(y) One (1) VOC fractionator for separating gasoline and fuel oil of transmix tanks, identified as FRACT, venting 125 cubic feet of VOC vapor per minute during intermittent pressure relief with venting gas being controlled by VCU, and equipped with a 7.0 million million British thermal units per hour natural gas fired reboiler.

(z) VOC emissions from the following operations:
(1) Fugitive VOC emissions from the loading rack, identified as FLRACK.
(2) Filter change out service for gasoline tanks, identified as FILT1.
(3) Meter proving service, identified as PROVE.

(aa) A wastewater handling and treatment system, capable of treating 420,000 gallons of contaminated water per hour, including the following activities:
(1) Five (5) sumps for wastewater from tank water draw and roof drains;
(2) One (1) sump for wastewater from loading rack;
(3) One (1) 379,638 gallon internal floating roof waste water/gasoline storage tank, identified as T-103, constructed in 1939;
(4) One (1) oil/water separator, identified as Separator No. 1, with a capacity of 1,800 gallons per hour; and
(5) One (1) air stripper capable of processing 9,000 gallon of water per hour.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units (Btu) per hour.

(b) Equipment powered by internal combustion engines of capacity equal to or less than 0.5 mmBtu/hr, except where total capacity of equipment operated by one stationary source exceeds 2.0 mmBtu/hr.

(c) Combustion source flame safety purging on startup.

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(e) VOC and HAP storage tanks with capacity less than or equal 1,000 gallons and annual throughputs less than 12,000 gallons.

(f) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(g) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;

(h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(i) Cleaners and solvents characterized as follows:
(1) having a vapor pressure equal to or less than 2 kPa, 15 mmHg, or 0.3 psi measured at 38^{o}C; or
(2) having a vapor pressure equal to or less than 0.7 kPa, 0.1 mmHg, or 0.1 psi measured at 20^{o}C.

The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(j) The follow equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;

(k) Groundwater oil recovery wells.

(l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by weight.

(m) Any operation using aqueous solvents containing less than 1% by weight of VOCs, excluding HAPs.

(n) Heat exchanger cleaning and repair.

(o) Process vessel degassing and cleaning to prepare for internal repairs.

(p) Stockpiled soils from soil remediation activities that ar covered and waiting transportation for disposal.

(q) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(r) Asbestos abatement projects regulated by 326 IAC 14-10.

(s) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(t) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(u) Blowdown for any of the following:
sight glass, boiler, compressors, pumps, and cooling tower.

(v) On-site fire and emergency response training approved by the department.

(w) Gasoline generators not exceeding 110 horsepower.

(x) Stationary fire pumps.

(y) Purge double block and bleed valves.

(z) Filter or coalescer media changeout.

(aa) A laboratory as defined in 326 IAC 2-7-1(21)(B).

(bb) Two (2) 36,414 gallon horizontal pressurized tanks, identified as T-4201 and T4202, both constructed in 1975.

(cc) Three (3) pressurized spheroid tanks, identified as T-051, T-210 and T-301, each with a respective capacity of 197,400, 753,018 and 1,125,012 gallons, and each constructed in 1963, 1959 and 1961, respectively.

(dd) Fugitive liquid and vapor emissions due to equipment leaks.

(ee) Cleaning of non-gasoline tanks.

(ff) One (1) oil/water separator, identified as Separator No. 2, with a capacity of 1,000 gallons per hour.

(gg) Pipeline pigging.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Part 70 operating permit 089-7520-00326, issued on June 12, 1998.

(b) First Significant Permit Modification 089-11264-00326, issued on December 6, 1999.

(c) Second Significant Permit Modification 089-14987-00326, issued on June 14, 2002.

(d) First Minor Source Modification 089-16040-00326, issued on November 20, 2002.

(e) First Minor Permit Modification 089-16216-00326, issued on January 29, 2003.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on October 7, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (nine (9) pages).

Unrestricted Potential Emissions

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	greater than 250
CO	greater than 250
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Benzene	less than 10
Toluene	greater than 10
Ethylbenzene	less than 10
Xylenes	less than 10
Cumene	less than 10
Hexane	greater than 10
Isooctane	greater than 10
MTBE	less than 10
Naphthalene	less than 10
TEL	less than 10
Phenol	less than 10
Methanol	less than 10
TOTAL	Greater than 25

(a) The unrestricted potential emissions (as defined in 326 IAC 2-1.1-1(16)) of VOC and CO are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The unrestricted potential emissions (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the unrestricted potential emissions (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM-10	not reported
SO_2	not reported
VOC	93.0
CO	12.0
NO_x	3.0
HAP (specify)	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original Part 70 Permit. (T089-7520-00326; issued on June 12, 1998).

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Storage Tanks	--	--	--	123.44	–	--	2.33 (single) 8.87 (total)
Loading Rack (VCU)	--	--	--	49.86	--	--	0.94 (single) 3.57 (total)
Loading Rack (Fugitives)	--	--	--	14.29	--	--	0.27 (single) 1.02 (total)
Vapor Combustion Unit (VCU)	--	--	--	0.09	47.68	9.82	negl.
Non-tank Process emissions (1)	--	--	--	18.67	--	--	0.61 (single) 2.14 (total)
Insignificant Activities (2)	0.14	0.31	0.10	5.85	3.61	4.20	1.26 (single) 3.64 (total)
Total Emissions	0.14	0.31	0.10	212.20	51.29	14.02	< 10 (single) < 25 (total)

Notes:
(1) Non-tank process emissions consist of VOC emissions from Tank Cleaning (gasoline), Filter Changeout (gasoline), Meter Proving and Wastewater handling and treatment system.
(2) Insignificant activities consist of Filter Change-out (distillate), Pipeline Pigging, Oil water separator # 2, and Fugitives from equipment leaks.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	moderate non-attainment
SO_2	non-attainment
NO_2	attainment
Ozone	severe non-attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as severe nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) A portion of Lake County has been classified as nonattainment for particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (PM-10) and sulfur dioxide (SO2, primary standard only). The source is located in East Chicago which is in the SO2 nonattainment portions of Lake County. Therefore, source emissions of PM-10 and SO2 were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(c) A portion of Lake County has been classified as attainment for carbon monoxide (CO), and attainment or unclassifiable for the remainder of the county for CO and for the remaining criteria pollutants. Therefore, source emissions for the remaining criteria pollutants were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) Storage tanks identified as T-1501, T-1502, T-202, T-204, T-205, T-206, T-207, T-208, T-209, T-2101, T-2102, T-240, T-401, T-201, T-801, T-802, T-803, T-804, T-805, T-806, T-807, T-808, T-809, T-810, and T-103 are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Parts 60.110, 110a-115a or 110b-117b, Subparts K, Ka and Kb), because these tanks were all constructed between 1953 and 1970, prior to the earliest applicability date of June 11, 1973 for Subpart K, Ka or Kb.

(b) Storage tanks identified as T-2601 and 2602 (re-constructed in 2002) are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart Kb) where construction, reconstruction, or modification commenced after July 23, 1984, because these tanks have storage capacities greater than 40 cubic meters. These tanks have capacities greater than 151 cubic meters (m^3) (39,889 gallons) and store only volatile organic compounds with a maximum true vapor pressure less than 3.5 kPa. Therefore, pursuant to 40 CFR 60.110b(c), these tanks are exempt from all other provisions of this Subpart except 60.116b, which requires that permanent records be maintained showing dimensions and an analysis of the capacities of each tank.

(c) The existing loading rack is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.500, Subpart XX) “Standards of Performance for Bulk Gasoline Terminals” because the loading rack was constructed in 1940 and reconstructed in 1979, which was prior to the December 17, 1980 applicability date, and was not modified or reconstructed since then. The VCU used for controlling VOC emissions from gasoline loading operations was installed in 1997 to replace the originally equipped vapor recovery unit (VRU) to improve control efficiency from 95% to 99%. Although the VCU installed increased both CO and NOx emissions, the primary function of the unit is to control VOC emissions and the cost of the control device did not exceed 50% of an entire new loading rack. Pursuant to 40 CFR 60.14 (e)(5) and 40 CFR 60.15 (b)(1), this replacement of the VOC control device in 1997 is neither a modification nor a reconstruction under the definition in the NSPS.

(d) The wastewater treatment and handling system, is not subject to not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.150, Subpart O) because the wastewater system does not have any incinerators.

(e) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63.420, Subpart R), because the source is not a major source of HAP. The source has chosen to limit the source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively, by the following material throughput limits and the control device.

(1) Limit amount of material handled by loading rack to the following:
  (i) 320 million gallons of gasoline per twelve (12) consecutive month period with compliance determined at the end of each month;
  (ii) 320 million gallons of distillate fuel per twelve (12) consecutive month period with compliance determined at the end of each month; and
  (iii) 9.142 million gallons of ethanol per twelve (12) consecutive month period with compliance determined at the end of each month.

(2) Operate the vapor combustion system, which has a capture efficiency of 98.7% and will emit no more than 35 mg VOC per liter of gasoline loaded, at all times when gasoline is being loaded at the loading rack.

(3) Limit amount of material handled by all storage tanks to the following:
  (i) 2,007 million gallons of gasoline per twelve (12) consecutive month period with compliance determined at the end of each month, with Tanks T-801 -T-810 (excluding T-807) handling more than 50% of throughput; and
  (ii) 789 million gallons of distillate fuel and all other non-gasoline materials per twelve (12) consecutive month period with compliance determined at the end of each month.

(4) Limit gasoline tank cleaning to 4 cleanings per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to VOC emissions of 13.5 tons per year and 432 hours of gasoline tank cleaning per year.

(5) Limit amount of wastewater handled and treated to 31.1 millions gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

(6) Limit the VOC emissions from the fractionator (FRACT) to 0.12 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to VOC emissions venting to the fractionator for 2,760 minutes per year and based on VOC emissions from the Fractionator being controlled by vapor combustion unit (VCU) with capture efficiency of 98.7%.

(f) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source, because the source has a limited potential to emit of less than 10 tons per year of a single HAP and less than 25 tons per year of the combination of HAPs.

(g) The parts degreasing operation (consisting of one (1) small parts cleaner) that uses Safety-Kleen part washing solvent with capacity less than 145 gallons, as an insignificant activity, is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63, Subpart T). Subpart T applies to degreasing operations using one of six listed halogenated solvents, or any combination of the solvents in a concentration greater than 5 percent by weight, as a cleaning or drying agent. The source uses Safety-Kleen part washing solvent which contains no halogenated solvents; therefore, Subpart T does not apply.

(h) 40 CFR 64 Compliance Assurance Monitoring rule is determined to be applicable to the loading rack at this source during this Part 70 permit renewal review process.

(A) This Part 70 source does include a pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC:

(1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year of VOC;

(2) that is subject to an emission standard for VOC and has a control device that is necessary to meet that limit; and

(3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

The one (1) Truck loading rack, identified as Loading Rack at this Part 70 source has an uncontrolled PTE of VOC of greater than 100 tons per year, and uses a control device (Loading Rack Flare) as defined in 40 CFR 64.1 to comply with an emission limitation or standard. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to this source.

(B) The pollutant-specific emission unit is not a “large unit” as described in 40 CFR 64.5. Therefore, the owner or operator has submitted a CAM plan pursuant to 40 CFR 64 as part of the Part 70 renewal application.

The loading of gasoline into any transports at this source is subject to the requirements of 326 IAC 8-4-4 (Bulk Gasoline Terminals). Pursuant to 326 IAC 8-4-4 requirements, the VOC emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks shall not exceed 80 milligrams of total organic compounds per liter of gasoline loaded. The compliance test conducted on June 8, 2002 confirmed that the VCU at the source will control vapors from gasoline loading to less than 35 mg/l of gasoline loaded (with overall VOC capture efficiency of 98.7%).

The following CAM plan, which was submitted by the source, shall satisfy the 40 CFR 64 Compliance Assurance Monitoring requirements.

(1) The vapor combustion unit (VCU) shall operate at all times the loading rack (RACK) is transferring gasoline or when the fractionator (FRACT) is in operation. The permittee shall install and maintain a monitor to detect the presence of a pilot flame. The presence of a pilot flame shall be monitored using a heat-sensing device at all times when the vapors are being vented to the VCU. The monitor shall be equipped with a computer system which will not allow for the operation of the loading rack (RACK) and/or the fractionator (FRACT) when the presence of a flame is not detected during periods when gasoline vapors are being vented to the VCU.

(2) Daily checks for liquid leaks during loading or unloading operations of the Loading Rack, the vapor collection system and the vapor recovery unit (VRU) shall be performed during normal daylight operations when the facility is in operation. A trained employee will record any visible liquid leaks and the date of such leaks. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a liquid leak is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. All checks for visible liquid leaks made to comply with this condition shall be conducted in accordance with 326 IAC 8-4-9.

State Rule Applicability - Entire Source

There are no new state rules applicable to the entire source during this Part 70 Permit renewal review process. The applicability determination that follows is based on that conducted for original Part 70 Permit 089-7520-00326; issued on June 12, 1998.

326 IAC 2-2 and 326 IAC 2-3 (PSD and Emission Offset)

The existing source was constructed prior to the August 7, 1977 rule applicability date. This source is not considered a major source because it is not one of the 28 listed source categories and it has the potential to emit after controls of less than 250 tons per year of any criteria pollutant. In the past no major modifications were done, therefore, the source is not subject to the requirements of Emission Offset and Prevention of Significant Deterioration (PSD).

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because no new or reconstructed facilities with a PTE of any single HAP at 10 tons per year or 25 tons per year of the combination HAPs have been installed since July 27, 1997. Therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Lake County and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1-2 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-11.1 (Fugitive Particulate Matter Emission Limitations in Lake County)

This source is subject to the requirements of 326 IAC 6-1-11.1 (Fugitive Particulate Matter Emission Limitations in Lake County). The rule requires that, for facilities and operations at the source, the average instantaneous opacity of fugitive particulate emissions from each facility or operation shall not exceed ten percent (10%). Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 9.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-5(a), the requirements of this rule does not apply to a source of fugitive PM emission located in Lake County. Since this source is located in Lake County, this rule does not apply.

State Rule Applicability - Individual Facilities

There are no new state rules determined as applicable to individual facilities at this source during this Part 70 Permit renewal review process. The applicability determination that follows is based on that conducted for original Part 70 Permit 089-7520-00326; issued on June 12, 1998.

326 IAC 6-1-2 (Particulate Emission Limitations)

This source is not subject to the requirements of 326 IAC 6-1-2 because the potential particulate emissions are less than 100 tons per year and actual particulate emissions are less than 10 tons per year.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(9), the welding operation is exempt from 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because less than 625 pounds of wire is consumed per day.

326 IAC 6-1-10.1 (Lake County PM-10 Emission Requirements)

The source is not listed in 326 IAC 6-1-10(d). Therefore, pursuant to 326 IAC 6-1-10(a), the requirements of 326 IAC 6-1-10 do not apply.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and are not otherwise regulated by other provisions of Article 8. No new emission units with VOC emission greater than 25 tons per year have been installed after the rule applicability date of January 1, 1980. Therefore, rule 326 IAC 8-1-6 does not apply to this source.

326 IAC 8-3-2 (Cold Cleaner Operations)

The source, which is located in Lake County and maintains Safety-Kleen type cold cleaning parts washer with capacity of less than 145 gallons per year(i.e., insignificant activities), is not subject to the applicable rule requirements since this facility was constructed prior to the rule applicability date of January 1, 1980.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

This rule applies to all petroleum liquid storage facilities in Clark, Elkhart, Floyd, Hendricks, Lake, Marion, Porter, and St. Joseph Counties regardless of the construction dates. Since this source in located in Lake County, the petroleum liquid storage tanks identified as T-103, T-201, T-202, T-204, T-207, T-209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809 and T-810, each with a capacity greater than 39,000 gallons containing volatile organic liquid whose true vapor pressure is greater than 1.52 pounds per square inch (psi) are subject to the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities). All other storage tanks at the source are not subject to the requirements of 326 IAC 8-4-3. Storage tanks identified as T-205, T-206, T-208, T-240, T-807, T-2101, T-2102, T-2601 and T-2602, each store petroleum liquid whose true vapor pressure is less than 1.52 psi and therefore, not subject to the rule. Storage tanks identified as T-1501 and T-1502, each has a capacity less than 39,000 gallons, therefore the rule does not apply.

Pursuant to 326 IAC 8-4-3, Tanks T-103, T-201, T-202, T-204, T-207, T-209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809 and T-810 are subject to the following:

(a) For External Fixed Roof Tanks

(1) The facility must be retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with equally effective alternative control which has been approved.

(2) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.

(3) All openings, except stub drains, are equipped with covers, lids, or seals such that:

(A) the cover, lid, or seal is in the closed position at all times except when in actual use;
(B) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
(C) rim vents, if provided are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

(b) For External Floating Roof Tanks

The owner of a facility subject to this subsection shall not store a petroleum liquid in that facility unless:

(1) The facility has been fitted with:

(A) a continuous secondary seal extending from the floating roof to the tank wall (rim-mounted secondary seal); or
(B) a closure or other device approved by the commissioner which is equally effective.

(2) All seal closure devices meet the following requirements:

(A) there are no visible holes, tears, or other openings in the seal(s) or seal fabric;
(B) the seal(s) are intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall;

(C) for vapor mounted primary seals, the accumulated gap area around the circumference of the secondary seal where a gap exceeding one-eighth (1/8) inch exists between the secondary seal and the tank wall shall not exceed 1.0 square inch per foot of tank diameter. There shall be no gaps exceeding on-half (½) inch between the secondary seal and the tank wall of welded tanks and no gaps exceeding one (1) inch between the secondary seal and the tank wall of riveted tanks.

(3) All openings in the external floating roof, except for automatic bleeder vents, rim space vents, and leg sleeves are:

(A) equipped with covers, seals, or lids in the closed position except when the openings are in actual use; and
(B) equipped with projections into the tank which remain below the liquid surface at all times.

(4) Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;

(5) Rim vents are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting; and

(6) Emergency roof drains are provided with slotted membrane fabric covers or equivalent covers which cover at least ninety percent (90%) of the area of the opening.

Additionally, pursuant to 326 IAC 8-4-3, the Permittee shall maintain records including the following:

(a) the types of volatile petroleum liquids stored;
(b) the maximum true vapor pressure; and
(c) records of the inspections.

All storage tanks at the source including T-103, T-201, T-202, T-204, T-207, T209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809 and T-810, are either external floating roof tanks with dome covers as well as primary and secondary seals, or internal floating roof tanks with closure seal or seals. Therefore, the source complies with the requirements of 326 IAC 8-4-3.

326 IAC 8-4-4 (Bulk Gasoline Terminals)

Pursuant to 326 IAC 8-4-1, the loading of gasoline into any transports at this source is subject to the requirements of 326 IAC 8-4-4 (Bulk Gasoline Terminals) because the source is a bulk gasoline terminal (having a limited daily gasoline throughput of approximately 876,712 gallons per day which is greater than the 20,000 gallons per day threshold to meet the definition of bulk gasoline terminal). The source will comply with the requirements of this rule because the loading rack (identified as RACK) is equipped with an approved control system (Vapor Combustion Unit (VCU)), with overall VOC capture efficiency of 98.7% which meets the required less than 80 mg/l VOC concentration.

326 IAC 8-4-5 (Bulk Gasoline Plants)

The source is not subject to the requirements of 326 IAC 8-4-5 (Bulk Gasoline Plants) since the source does not meet the definition of a bulk gasoline plant, which requires a daily gasoline throughput of less than 20,000 gallons per day.

326 IAC 8-4-6 (Gasoline Dispensing Facilities)

The source is not subject to the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities), because the source does not dispense gasoline into motor vehicle fuel tanks or portable containers and is not a gasoline dispensing facility.

326 IAC 8-4-7 (Gasoline Transports)

The source is not subject to the requirements of 326 IAC 8-4-7 (Gasoline Transports), because it is not an owner or operator of a gasoline transport.

326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems; Records)

Pursuant to 326 IAC 8-4-9, sources subject to the requirements of 326 IAC 8-4-4 are also subject to the requirements of 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems, Records). Pursuant to this rule, the source will comply with the requirements of this rule because the loading rack is equipped with a collection system (VCU), which has been demonstrated to have a overall VOC capture efficiency of 98.7%. The source will operate the vapor collection system in accordance with the specified workpractice standards and will maintain the required records associated with the operation of the vapor collection and vapor control systems (VCU).

326 IAC 8-6 (Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1, the requirements of this rule apply to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. No emissions units were constructed at this source between October 7, 1974 and January 1, 1980 with potential VOC emissions of 100 tons per year or more, therefore, this source is not subject to this rule.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

This source is petroleum operations, however, pursuant to 326 IAC 8-7-2(a)(3)(C), petroleum operations are exempt. Therefore, 326 IAC 8-7 does not apply.

326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirements of the rule if located in Clark, Floyd, Lake or Porter Counties. Stationary vessels with capacities less than 39,000 gallons are only subject to the reporting and record keeping requirements of the rule. Stationary vessels with capacities equal to or greater than 39,000 gallons storing a VOL with a maximum true vapor pressure equal to or greater than 0.5 pounds per square inch absolute (psia), but less than 0.75 psia, are only subject to 326 IAC 8-9-6(a),(b),(g), and (h).

(a) Storage tanks identified as T-1501 and T-1502 are only subject to the reporting and record keeping requirements of this rule. While the listed tanks contain volatile organic compounds, they have storage capacities less than 39,000 gallons.

(b) Storage tanks identified as (T-103, T-201, T-202, T-204, T-207, T-209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809, T-810 T-205, T-206, T-208, T-240, T-807, T-2101, T-2102, T-2601, and T-2602), with capacity greater than 39,000 gallons, are subject to the requirements of this rule because the listed tanks contain petroleum liquids with vapor pressure of greater than 0.75 psia.

Pursuant to this rule, the Permittee shall equip each tank with one (1) of the following:

(a) At the time of the next scheduled cleaning, but not later than ten (10) years after May 1, 1996, an internal floating roof meeting the following specifications:

(i) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

(ii) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

(A) A foam or liquid -filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid mounted seal means a foam - or liquid filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

(B) Two seals mounted one above the others so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor mounted, but both must be continuous.

(iii) Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

(iv) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

(v) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

(vi) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

(vii) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

(viii) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

(ix) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

(b) At the time of the next scheduled cleaning, but not later than ten (10) years after May 1, 1996, an external floating roof meeting the following specifications:

(i) Each external floating roof shall be equipped with a closure device between the wall of the vessel and the roof edge. The closure device shall consist of two (2) seals, one (1) above the other. The lower seal shall be referred to as the primary seal; the upper seal shall be referred to as the secondary seal.

(ii) Except as provided in 326 IAC 8-9-5(c)(4), the primary seal shall completely cover the annular space between the edge of the floating roof and vessel wall and shall be either a liquid-mounted seal or a shoe seal.

(iii) The secondary seal shall completely cover the annular space between the external floating roof and the wall of the vessel in a continuous fashion except as allowed in 326 IAC 8-9-5(c)(4).

(iv) Except for automatic bleeder vents and rim space vents, each opening in a noncontact external floating roof shall provide a projection below the liquid surface.

(v) Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof shall be equipped with a gasketed cover, seal, or lid that shall be maintained in a closed position at all times, without visible gap, except when the device is in actual use.

(vi) Automatic bleeder vents shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

(vii) Rim vents shall be set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. Automatic bleeder vents and rim space vents shall be gasketed.

(viii) Each emergency roof drain shall be provided with a slotted membrane fabric cover that covers at least ninety percent (90%) of the area of the opening.

(ix) The roof shall be floating on the liquid at all times, for example, off the roof leg supports, except when the vessel is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.

(c) At the time of the next scheduled cleaning, but not later than ten (10) years after May 1, 1996, a closed vent system and control device meeting the following specifications:

(i) The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in part 60, subpart VV, 40 CFR 60.485(b).

(ii) The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements (40 CFR 60.18) of the General Provisions.

(d) A system equivalent to those described in paragraphs a, b and c as provided in 326 IAC 8-9-4.

(e) The testing procedures are required under 326 IAC 8-9-5. The record keeping and reporting are required under 326 IAC 8-9-6.

(f) On or before May 1, 1996, the Permittee of each vessel with a capacity greater than or equal to thirty-nine thousand (39,000) gallons, that stores VOL with a maximum true vapor pressure greater than or equal to eleven and one-tenth (11.1) psia shall equip each vessel with a closed vent system meeting the standards of paragraph (c).

All storage tanks at the source, which are subject to the requirements of 326 IAC 8-9-4 (including tanks T-103, T-201, T-202, T-204, T-207, T-209, T-401, T-801, T-802, T-803, T-804, T-805, T-806, T-808, T-809, T-810 T-205, T-206, T-208, T-240, T-807, T-2101, T-2102, T-2601, and T-2602), are equipped with internal and external floating roof with primary and secondary seals. The source shall not store a VOL in these tanks with a maximum true vapor pressure greater than or equal to eleven and one-tenth (11.1) psia. Therefore, the source complies with the requirements of 326 IAC 8-9-4.

326 IAC 9–1 (Carbon Monoxide Emission Limits)

The source is not subject to the requirements of 326 IAC 9–1 (Carbon Monoxide Emission Limits), because the VCU is not one of the facility categories listed in 326 IAC 9-1-2.

Testing Requirements

Testing requirement from previous approval was incorporated into this Part 70 Permit. The compliance stack test shall be performed between June 8, 2005 and December 8, 2005 which corresponds to five (5) years since the latest valid stack test plus one hundred and eighty (180) days at the vapor combustion unit (VCU) to demonstrate compliance with single HAP and combined HAPs emissions being less than 10 and 25 tons per year, respectively, to render the requirements of 40 CFR Part 63.420, Subpart R not applicable. This test shall be performed according to the procedures approved by the commisioner.

Previous stack test to comply with this requirement was conducted as follows:

(a) VOC emissions testing was performed on June 8, 2000.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

1. The operation of the loading rack and vapor combustion unit (VCU) has applicable compliance monitoring conditions as specified below:

   (a) The vapor combustion unit (VCU) shall operate at all times the loading rack (RACK) is transferring gasoline or when the fractionator (FRACT) is in operation. The permittee shall install and maintain a monitor to detect the presence of a pilot flame. The presence of a pilot flame shall be monitored using a heat-sensing device at all times when the vapors are being vented to the VCU. The monitor shall be equipped with a computer system which will not allow for the operation of the loading rack (RACK) and/or the fractionator (FRACT) when the presence of a flame is not detected during periods when gasoline vapors are being vented to the VCU.

   (b) Daily checks for liquid leaks during loading or unloading operations of the Loading Rack, the vapor collection system and the vapor recovery unit (VRU) shall be performed during normal daylight operations when the facility is in operation. A trained employee will record any visible liquid leaks and the date of such leaks. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a liquid leak is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. All checks for visible liquid leaks made to comply with this condition shall be conducted in accordance with 326 IAC 8-4-9.

   These monitoring conditions are necessary to demonstrate compliance with single HAP and combined HAPs emissions limited to less than 10 and 25 tons per year, respectively. Therefore, the requirements of 40 CFR Part 63.420, Subpart R do not apply.

Conclusion

The operation of this bulk liquid fuel storage and transfer terminal shall be subject to the conditions of the attached proposed Part 70 Permit No. T089-16208-00326.

Appendix A: Emission Calculations

Company Name: Phillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Adeel Yousuf / EVP
Date: May 15, 2003

Total Potential To Emit (tons/year)

	Emissions Generating Activity					
Pollutant	Storage Tanks	Loading Rack VCU + Fugitives	Non-tank Processes Significant	VCU Emissions	Insignificant Activities	**TOTAL**
PM	0.00	0.00	0.00	0.00	0.14	0.14
PM10	0.00	0.00	0.00	0.00	0.31	0.31
SO2	0.00	0.00	0.00	0.00	0.10	0.10
NOx	0.00	0.00	0.00	82.29	4.20	86.49
VOC	123.44	620.16	130.50	0.78	9.71	884.59
CO	0.00	0.00	0.00	399.40	3.61	403.01
total HAPs	8.87	44.42	10.35	0.00	negl.	63.64
worst case single HAP	2.33 (Isooctane)	11.72 (Isooctane)	2.57 (Toluene)	0.00	negl.	17.20 (Isooctane)

Total emissions based on rated capacities at 8,760 hours/year.

Limited Potential To Emit (tons/year)

	Emissions Generating Activity					
Pollutant	Storage Tanks	Loading Rack VCU + Fugitives	Non-tank Processes Significant	VCU Emissions	Insignificant Activities	**TOTAL**
PM	0.00	0.00	0.00	0.00	0.14	0.14
PM10	0.00	0.00	0.00	0.00	0.31	0.31
SO2	0.00	0.00	0.00	0.00	0.10	0.10
NOx	0.00	0.00	0.00	9.82	4.20	14.02
VOC	123.44	64.15	16.17	0.09	5.85	209.70
CO	0.00	0.00	0.00	47.68	3.61	51.29
total HAPs	8.87	4.60	2.14	0.00	3.64	19.25
worst case single HAP	2.33 (Isooctane)	1.21 (Isooctane)	0.61 (Toluene)	0.00	1.26 (Xylenes)	4.91 (Toluene)

Total emissions based on rated capacities at 8,760 hours/year.

* Single HAP and total HAPs emissions are limited to less than 10 and 25 tons per year, respectively, to satisfy the requirements of 326 IAC 2-8-4.

Appendix A: Emission Calculations
Potential Tank VOC Emissions

Company Name: Phillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Adeel Yousuf / EVP
Date: May 15, 2003

Tank Number	Product Stored	Working	Withdraw	Rim Seal	Deck Fitting	Deck Seam	Breathing	Total VOC Tons/yr
T-1501	Gasoline Add.	0.24	--	--	--	--	0.02	0.26
T-1502	Gasoline Add.	0.01	--	--	--	--	0.08	0.09
T-202	Gasoline	--	0.90	0.97	9.05	0.00	--	10.92
T-204	Gasoline	--	0.87	0.45	1.15	0.00	--	2.47
T-205	Distillate	0.75	--	--	--	--	0.07	0.83
T-206	Distillate	0.75	--	--	--	--	0.08	0.84
T-207	Gasoline	--	0.73	0.13	1.15	0.00	--	2.00
T-208	Kerosene	1.02					0.03	1.05
T-209	Gasoline		0.42	0.13	1.15	0.00		1.69
T-2101	Kerosene	3.63	--	--	--	--	0.60	4.23
T-2102	Kerosene	3.63	--	--	--	--	0.60	4.22
T-240	Kerosene	1.25	--	--	--	--	0.06	1.31
T-2601	Kerosene	4.25	--	--	--	--	0.73	4.97
T-2602	Kerosene	4.25	--	--	--	--	0.73	4.97
T-401	Gasoline		0.36	0.19	0.35	0.00		0.90
T-201	Gasoline		0.81	1.00	9.26	0.00		11.07
T-801	Gasoline		0.73	2.00	9.07	0.00		11.80
T-802	Gasoline		0.49	2.02	3.13	0.00		5.64
T-803	Gasoline		0.50	2.00	3.13	0.00		5.63
T-804	Gasoline		0.50	2.00	15.90	0.00		18.40
T-805	Gasoline		0.49	2.00	15.90	0.00		18.39
T-806	Gasoline		0.50	2.00	3.13	0.00		5.63
T-807	Distillate	1.36					0.10	1.46
T-808	Gasoline		0.41	0.26	0.30	0.00		0.98
T-809	Gasoline		0.41	0.26	0.31	0.00		0.98
T-810	Gasoline		0.41	0.26	0.31	0.00		0.98
T-103	Gasoline		1.74	0.00	0.01	0.00		1.75
Total VOC		**21.1**	**10.3**	**15.7**	**73.3**	**0.0**	**3.1**	**123.4**

Note: (1) All storage tank emissions estimated using EPA's TANKS 4.09 software program.
(2) Worst case VOC emissions due to withdraw loss were deteremined based on the following assumptions:
(a) All gasoline is transferred through T-202, T-204 or T-801 with a total limited annual throughput of 2,007 million gallons (47.8 million barrels), with. Tanks T-801 - T-810 (except for T-807 which is not a gasoline tank) handling more than 50% of total throughput.
(b) All distillate/kerosene is transferred through T-2602 with a limited annual throughput of 788.8 million gallons (18.8 million barrels).

Appendix A: Emission Calculations
Potential Non-Tank Emissions

Company Name: Phillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Adeel Yousuf / EVP
Date: May 15, 2003

	Facility ID	Facility Description	VOC (1) (ton/yr)
	Significant Units		
Loading Rack	FLRACK	Loading Rack Fugitive (2)	175.23
	RACK	Loading Rack (3)	444.93
	TNKCLN GAS	Tank Cleaning (Gasoline)	64.72
	FILT1	Filter Changeout (Gasoline)	14.95
	PROVE	Meter Proving	15.20
Wastewater Handling and Treatment System	OWS1	Oil/Water Separator #1	3.94
	SUMPS 1-5	Sumps for Tanks	26.28
	SUMP 6	Sump for Loading Dock	3.94
	STRIPPER	Air Stripper	1.47
		Sub Total	750.66
	Insignificant Units		
	FILT2	Filter Changeout (KTF)	0.43
	FILT3	Filter Changeout (Distillate)	0.02
	PIG1	Pipeline Pigging	2.68
	FUG LIQ	Equip. Leaks (Liquid)	5.38
	FUG VAP	Equip. Leaks (Vapor)	0.04
	OWS2	Oil/Water Separator #2	0.88
		Sub Total	9.43
		Grand Total	**760.09**

Note:
(1) The emissions listed are based on the emission calculations submitted by the applicant which were verified and found to be accurate and correct.
(2) Fugitive VOC emissions are emissions due to loading of materials that are not routed to vapor combustion unit (VCU) with 98.7% capturing.
(3) Emissions from loading of liquid fuels that are routed through VCU and the intermittent venting of the Fractionator during pressure relief. Allowable emission of 35 mg/L gasoline loaded is used for calculating emissions from gasoline loading.
(4) VOC emissions from tank cleaning are based on each of the 27 tanks (16 gasoline and 11 distillate tanks) being cleaned once per year.

Appendix A: Emission Calculations
Limited Non-Tank Emissions

Company Name: Phillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Adeel Yousuf / EVP
Date: May 15, 2003

	Facility ID	Facility Description	VOC (1) (ton/yr)
	Significant Units		
Loading Rack	FLRACK	Loading Rack Fugitive (2)	14.29
	RACK	Loading Rack (3)	49.86
	TNKCLN GAS	Tank Cleaning (Gasoline)	13.53
	FILT1	Filter Changeout (Gasoline)	0.01
	PROVE	Meter Proving	0.13
Wastewater Handling and Treatment System	OWS1	Oil/Water Separator #1	0.15
	SUMPS 1-5	Sumps for Tanks	0.75
	SUMP 6	Sump for Loading Dock	0.15
	STRIPPER	Air Stripper	1.45
		Sub Total	80.32
	Insignificant Units		
	FILT2	Filter Changeout (KTF)	0.00
	FILT3	Filter Changeout (Distillate)	0.00
	PIG1	Pipeline Pigging	0.003
	FUG LIQ	Equip. Leaks (Liquid)	5.38
	FUG VAP	Equip. Leaks (Vapor)	0.04
	OWS2	Oil/Water Separator #2	0.15
		Sub Total	5.57
		Grand Total	**85.89**

Note:
(1) The emissions listed are based on the emission calculations submitted by the applicant which were verified and found to be accurate and correct.
(2) Fugitive VOC emissions are emissions due to loading of materials that are not routed to vapor combustion unit (VCU) with 98.7% capturing.
(3) Loading Rack emissions include emissions from loading of liquid fuels that are routed through VCU and the intermittent venting of the Fractionator during pressure relief. Controlled VOC emissions of 35 mg/L gasoline loaded is used for calculating emissions from gasoline loading.
(4) Calculations for loading rack are based on the limited fuel throughputs of 320 mmGal/yr for each of gasoline and distillate and 9.142 mmGal/yr of ethanol,
(5) Gasoline tank cleaning is limited to 4 tank cleanings per year.

Appendix A: Emission Calculations
Process Fugitive

Company Name: Phillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Adeel Yousuf / EVP
Date: May 15, 2003

Component Type	Service	Avg. Emission Factor	Component Quantity	VOC Emissions (lb/hr)	VOC Emissions (tons/yr)
		(lb/hr/unit)			
Pump Seals	Light Liquid	1.17E-03	70	0.082	0.36
Pump Seals	Heavy Liquid	1.17E-03	14	0.016	0.07
Valves	Light Liquid	9.00E-05	2822	0.254	1.11
Valves	Heavy Liquid	9.00E-05	1411	0.127	0.56
Connectors	Light Liquid	2.00E-05	11290	0.226	0.99
Connectors	Heavy Liquid	2.00E-05	5645	0.113	0.49
Open-ended Lines	Light Liquid	2.90E-04	845	0.245	1.07
Other	Light Liquid	2.90E-04	330	0.096	0.42
Relief Valves	Liquid	2.90E-04	240	0.070	0.30
			Total (Liquid):	1.228	5.38
Valves	Vapor	3.00E-05	38	0.001	0.00
Connectors	Vapor	9.00E-05	77	0.007	0.03
			Total (Vapor):	0.008	0.04
Total				**1.24**	**5.42**

Note: Emission factors are taken from: U.S. EPA. Office of Air Quality Planning and Standards. Protocol for Equipment Leak Emission Estimates. (Research Triangle Park, NC: U.S. EPA EPA-453/R-95-017, 1995). Table 2-3

Methodology:

VOC Emssions (tpy) = Quantiy x Emission Factor x (1 ton/ 2000 lb) x (8760 hr / 1 yr)

Appendix A: Emission Calculations
HAP Potential Emissions Summary

Company Name: Phillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Adeel Yousuf / EVP
Date: May 15, 2003

Source	Service	VOC	Vapor Weight Percent												Total
		Emissions	Benzene	Toluene	Ethylbezene	Xylenes	Cumene	Hexane	Isooctane	MTBE	Naphthalene	TEL	Phenol	Methanol	
	Gasoline/Distillate		0.90%	1.71%	0.10%	0.50%	0.01%	1.60%	1.89%	0.43%	0.02%	0.00%	0.00%	0.00%	
	Additive		0.47%	2.98%	0.54%	1.28%	0.06%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	10.38%	
	Process Liquid		2.90%	20.10%	3.70%	23.37%	0.98%	3.16%	12.05%	0.50%	0.49%	0.08%	0.00%	0.00%	
	Stripper Exh.		25.00%	25.00%	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	
			HAP Emissions (tons/yr)												
T-1501	Gasoline Add.	0.26	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.04
T-1502	Gasoline Add.	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01
T-202	Gasoline	10.92	0.10	0.19	0.01	0.05	0.00	0.17	0.21	0.05	0.00	0.00	0.00	0.00	0.78
T-204	Gasoline	2.47	0.02	0.04	0.00	0.01	0.00	0.04	0.05	0.01	0.00	0.00	0.00	0.00	0.18
T-205	Distillate	0.83	0.01	0.01	0.00	0.00	0.00	0.01	0.02	0.00	0.00	0.00	0.00	0.00	0.06
T-206	Distillate	0.84	0.01	0.01	0.00	0.00	0.00	0.01	0.02	0.00	0.00	0.00	0.00	0.00	0.06
T-207	Gasoline	2.00	0.02	0.03	0.00	0.01	0.00	0.03	0.04	0.01	0.00	0.00	0.00	0.00	0.14
T-208	Kerosene	1.05	0.01	0.02	0.00	0.01	0.00	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.08
T-209	Gasoline	1.69	0.02	0.03	0.00	0.01	0.00	0.03	0.03	0.01	0.00	0.00	0.00	0.00	0.12
T-2101	Kerosene	4.23	0.04	0.07	0.00	0.02	0.00	0.07	0.08	0.02	0.00	0.00	0.00	0.00	0.30
T-2102	Kerosene	4.22	0.04	0.07	0.00	0.02	0.00	0.07	0.08	0.02	0.00	0.00	0.00	0.00	0.30
T-240	Kerosene	1.31	0.01	0.02	0.00	0.01	0.00	0.02	0.02	0.01	0.00	0.00	0.00	0.00	0.09
T-2601	Kerosene	4.97	0.04	0.09	0.00	0.02	0.00	0.08	0.09	0.02	0.00	0.00	0.00	0.00	0.36
T-2602	Kerosene	4.97	0.04	0.09	0.00	0.02	0.00	0.08	0.09	0.02	0.00	0.00	0.00	0.00	0.36
T-401	Gasoline	0.90	0.01	0.02	0.00	0.00	0.00	0.01	0.02	0.00	0.00	0.00	0.00	0.00	0.06
T-201	Gasoline	11.07	0.10	0.19	0.01	0.06	0.00	0.18	0.21	0.05	0.00	0.00	0.00	0.00	0.79
T-801	Gasoline	11.80	0.11	0.20	0.01	0.06	0.00	0.19	0.22	0.05	0.00	0.00	0.00	0.00	0.84
T-802	Gasoline	5.64	0.05	0.10	0.01	0.03	0.00	0.09	0.11	0.02	0.00	0.00	0.00	0.00	0.40
T-803	Gasoline	5.63	0.05	0.10	0.01	0.03	0.00	0.09	0.11	0.02	0.00	0.00	0.00	0.00	0.40
T-804	Gasoline	18.40	0.17	0.31	0.02	0.09	0.00	0.29	0.35	0.08	0.00	0.00	0.00	0.00	1.32
T-805	Gasoline	18.39	0.17	0.31	0.02	0.09	0.00	0.29	0.35	0.08	0.00	0.00	0.00	0.00	1.32
T-806	Gasoline	5.63	0.05	0.10	0.01	0.03	0.00	0.09	0.11	0.02	0.00	0.00	0.00	0.00	0.40
T-807	Distillate	1.46	0.01	0.03	0.00	0.01	0.00	0.02	0.03	0.01	0.00	0.00	0.00	0.00	0.10
T-808	Gasoline	0.98	0.01	0.02	0.00	0.00	0.00	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.07
T-809	Gasoline	0.98	0.01	0.02	0.00	0.00	0.00	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.07
T-810	Gasoline	0.98	0.01	0.02	0.00	0.00	0.00	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.07
T-103	Gasoline	1.75	0.02	0.03	0.00	0.01	0.00	0.03	0.03	0.01	0.00	0.00	0.00	0.00	0.13
FLRACK	Gasoline	175.23	1.58	3.00	0.18	0.88	0.02	2.80	3.31	0.75	0.04	0.00	0.00	0.00	12.55
RACK	Gasoline	444.93	4.00	7.61	0.44	2.22	0.05	7.12	8.41	1.91	0.09	0.00	0.00	0.00	31.87
TNKCLN GAS	Gasoline	64.72	0.58	1.11	0.06	0.32	0.01	1.04	1.22	0.28	0.01	0.00	0.00	0.00	4.64
FILT1	Gasoline	14.95	0.13	0.26	0.01	0.07	0.00	0.24	0.28	0.06	0.00	0.00	0.00	0.00	1.07
PROVE	Gasoline	15.20	0.14	0.26	0.02	0.08	0.00	0.24	0.29	0.07	0.00	0.00	0.00	0.00	1.09
OWS1	Gasoline	3.94	0.04	0.07	0.00	0.02	0.00	0.06	0.07	0.02	0.00	0.00	0.00	0.00	0.28
SUMPS 1-5	Gasoline	26.28	0.24	0.45	0.03	0.13	0.00	0.42	0.50	0.11	0.01	0.00	0.00	0.00	1.88
SUMP 6	Gasoline	3.94	0.04	0.07	0.00	0.02	0.00	0.06	0.07	0.02	0.00	0.00	0.00	0.00	0.28
STRIPPER	Stripper Exh.	1.47	0.37	0.37	0.37	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.10
FILT2	Gasoline	0.43	0.00	0.01	0.00	0.00	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.03
FILT3	Gasoline	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PIG1	Gasoline	2.68	0.02	0.05	0.00	0.01	0.00	0.04	0.05	0.01	0.00	0.00	0.00	0.00	0.19
FUG LIQ	Process Liquid	5.38	0.16	1.08	0.20	1.26	0.05	0.17	0.65	0.03	0.03	0.00	0.00	0.00	3.62
FUG VAP	Gasoline	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
OWS2	Gasoline	0.88	0.01	0.01	0.00	0.00	0.00	0.01	0.02	0.00	0.00	0.00	0.00	0.00	0.06
Total	**tons/yr**	**883.5**	**8.4**	**16.4**	**1.4**	**5.6**	**0.2**	**14.2**	**17.2**	**3.8**	**0.2**	**0.0**	**0.0**	**0.0**	**67.6**

Note: (1) All storage tank emissions are calculated using EPA's TANKS 4.09 software program.
(2) Potential HAP emissions (tons/yr) = Potential VOC emissions (tons/yr) * Vapor Weight % HAPs
(3) FUG HAP emissions were conservatively estimated assuming all fluids in service had liquid gasoline HAP composition. Percent (%) by weight in liquid based on speciation for gasoline.
(4) Percent (%) weight in vapor conservatively based on speciation data either provided by Phillips or Gasoline Distribution MACT, Background Information for Proposed Standards (EPA-453/R-94-002A, Table C-5)
(5) HAPs emissions from additives are based on worst case gasoline additive HAP speciation provided by Phillips Pipe Line Co.
(6) Phenol and methanol are present only in fuel additive.

Appendix A: Emission Calculations
HAP Limited Emissions Summary

Company Name: Phillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Adeel Yousuf / EVP
Date: May 15, 2003

Source	Service	VOC	Vapor Weight Percent												Total
		Emissions	Benzene	Toluene	Ethylbezene	Xylenes	Cumene	Hexane	Isooctane	MTBE	Naphthalene	TEL	Phenol	Methanol	
	Gasoline/Distillate		0.90%	1.71%	0.10%	0.50%	0.01%	1.60%	1.89%	0.43%	0.02%	0.00%	0.00%	0.00%	
	Additive		0.47%	2.98%	0.54%	1.28%	0.06%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	10.38%	
	Process Liquid		2.90%	20.10%	3.70%	23.37%	0.98%	3.16%	12.05%	0.50%	0.49%	0.08%	0.00%	0.00%	
	Stripper Exh.		25.00%	25.00%	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	
			HAP Emissions (tons/yr)												
T-1501	Gasoline Add.	0.26	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.04
T-1502	Gasoline Add.	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01
T-202	Gasoline	10.92	0.10	0.19	0.01	0.05	0.00	0.17	0.21	0.05	0.00	0.00	0.00	0.00	0.78
T-204	Gasoline	2.47	0.02	0.04	0.00	0.01	0.00	0.04	0.05	0.01	0.00	0.00	0.00	0.00	0.18
T-205	Distillate	0.83	0.01	0.01	0.00	0.00	0.00	0.01	0.02	0.00	0.00	0.00	0.00	0.00	0.06
T-206	Distillate	0.84	0.01	0.01	0.00	0.00	0.00	0.01	0.02	0.00	0.00	0.00	0.00	0.00	0.06
T-207	Gasoline	2.00	0.02	0.03	0.00	0.01	0.00	0.03	0.04	0.01	0.00	0.00	0.00	0.00	0.14
T-208	Kerosene	1.05	0.01	0.02	0.00	0.01	0.00	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.08
T-209	Gasoline	1.69	0.02	0.03	0.00	0.01	0.00	0.03	0.03	0.01	0.00	0.00	0.00	0.00	0.12
T-2101	Kerosene	4.23	0.04	0.07	0.00	0.02	0.00	0.07	0.08	0.02	0.00	0.00	0.00	0.00	0.30
T-2102	Kerosene	4.22	0.04	0.07	0.00	0.02	0.00	0.07	0.08	0.02	0.00	0.00	0.00	0.00	0.30
T-240	Kerosene	1.31	0.01	0.02	0.00	0.01	0.00	0.02	0.02	0.01	0.00	0.00	0.00	0.00	0.09
T-2601	Kerosene	4.97	0.04	0.09	0.00	0.02	0.00	0.08	0.09	0.02	0.00	0.00	0.00	0.00	0.36
T-2602	Kerosene	4.97	0.04	0.09	0.00	0.02	0.00	0.08	0.09	0.02	0.00	0.00	0.00	0.00	0.36
T-401	Gasoline	0.90	0.01	0.02	0.00	0.00	0.00	0.01	0.02	0.00	0.00	0.00	0.00	0.00	0.06
T-201	Gasoline	11.07	0.10	0.19	0.01	0.06	0.00	0.18	0.21	0.05	0.00	0.00	0.00	0.00	0.79
T-801	Gasoline	11.80	0.11	0.20	0.01	0.06	0.00	0.19	0.22	0.05	0.00	0.00	0.00	0.00	0.85
T-802	Gasoline	5.64	0.05	0.10	0.01	0.03	0.00	0.09	0.11	0.02	0.00	0.00	0.00	0.00	0.40
T-803	Gasoline	5.63	0.05	0.10	0.01	0.03	0.00	0.09	0.11	0.02	0.00	0.00	0.00	0.00	0.40
T-804	Gasoline	18.40	0.17	0.31	0.02	0.09	0.00	0.29	0.35	0.08	0.00	0.00	0.00	0.00	1.32
T-805	Gasoline	18.39	0.17	0.31	0.02	0.09	0.00	0.29	0.35	0.08	0.00	0.00	0.00	0.00	1.32
T-806	Gasoline	5.63	0.05	0.10	0.01	0.03	0.00	0.09	0.11	0.02	0.00	0.00	0.00	0.00	0.40
T-807	Distillate	1.46	0.01	0.03	0.00	0.01	0.00	0.02	0.03	0.01	0.00	0.00	0.00	0.00	0.10
T-808	Gasoline	0.98	0.01	0.02	0.00	0.00	0.00	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.07
T-809	Gasoline	0.98	0.01	0.02	0.00	0.00	0.00	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.07
T-810	Gasoline	0.98	0.01	0.02	0.00	0.00	0.00	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.07
T-103	Gasoline	1.75	0.02	0.03	0.00	0.01	0.00	0.03	0.03	0.01	0.00	0.00	0.00	0.00	0.13
FLRACK	Gasoline	14.29	0.13	0.24	0.01	0.07	0.00	0.23	0.27	0.06	0.00	0.00	0.00	0.00	1.02
RACK	Gasoline	49.86	0.45	0.85	0.05	0.25	0.01	0.80	0.94	0.21	0.01	0.00	0.00	0.00	3.57
TNKCLN GAS	Gasoline	13.53	0.12	0.23	0.01	0.07	0.00	0.22	0.26	0.06	0.00	0.00	0.00	0.00	0.97
FILT1	Gasoline	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PROVE	Gasoline	0.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
OWS1	Gasoline	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
SUMPS 1-5	Gasoline	0.75	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.05
SUMP 6	Gasoline	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
STRIPPER	Stripper Exh.	1.45	0.36	0.36	0.36	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.09
FILT2	Gasoline	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FILT3	Gasoline	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PIG1	Gasoline	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FUG LIQ	Process Liquid	5.38	0.16	1.08	0.20	1.26	0.05	0.17	0.65	0.03	0.03	0.00	0.00	0.00	3.62
FUG VAP	Gasoline	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
OWS2	Gasoline	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
Total	**tons/yr**	**209.3**	**2.34**	**4.91**	**0.77**	**2.27**	**0.08**	**3.40**	**4.47**	**0.90**	**0.07**	**0.0051**	**0.00**	**0.04**	**19.25**

Note: (1) All storage tank emissions are calculated using EPA's TANKS 4.09 software program.
(2) Potential HAP emissions (tons/yr) = Potential VOC emissions (tons/yr) * Vapor Weight % HAPs
(3) FUG HAP emissions were conservatively estimated assuming all fluids in service had liquid gasoline HAP composition. Percent (%) by weight in liquid based on speciation for gasoline.
(4) Percent (%) weight in vapor conservatively based on speciation data either provided by Phillips or Gasoline Distribution MACT, Background Information for Proposed Standards (EPA-453/R-94-002A, Table C-5)
(5) HAPs emissions from additives are based on worst case gasoline additive HAP speciation provided by Phillips Pipe Line Co.
(6) Phenol and methanol are present only in fuel additive.

Appendix A: Emission Calculations
Natural Gas Combustion

Company Name: Phillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Adeel Yousuf / EVP
Date: May 15, 2003

I. Fuel Combustion

Heat Input Capacity		Potential Throughput	
7.1	MMBtu/hr	61.8	MMCF/yr

Heat Input Capacity includes:
one - 7 mmBtu/hr reboiler for the Fractionator
one - 0.054 mmBtu/hr pilot for the VCU

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.06	0.23	0.02	3.09	0.17	2.60

Methodology:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36
Emission Factors for CO: uncontrolled = 21, Low NOx burner = 15, Flue Gas Recirculation = ND.
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

II. VCU Emissions

Maximum Hourly Throughput		Limited Throughput	
612.0	1000 gal/hr	640.0	MMgal/yr

	Pollutant		
	NOx	CO	VOC
Emission Factor in lb/1000 gal throughput	0.0307	0.1490	35 (mg/1000 liter)
Potential Emission in tons/yr	82.29	399.40	0.78
Limited Emission in tons/yr	9.82	47.68	0.09

Methodology:
Emission factors were based on equipment manufacturer's information.
Potential Emission (ton/yr) =
Max. Hourly Throughput (1000 gal/hr) * Emission Factor (lb/1000 gal throughput) * 8760 (hr/yr) / 2000 (lb/ton)
Limited Emission (ton/yr) =
Limited Annual Throughput (mmgal/yr) * 1000 (1000/million) * Emission Factor (lb/1000 gal throughput) / 2000 (lb/ton)
Pursuant to 326 IAC 8-4-4, allowable VOC emissions are 80 mg/l000 liter loaded
Allowable VOC emissions = 80 mg/1000 liter * 612 (1000 gal/hr) * 3.78 liter/gal * (1/453,590) lb/mg * (1/2000) (ton/lb) * 8760 (hr/yr)
= 1.79 ton/yr

Appendix A: Emission Calculations
Insignificant Internal Combustion Engines

Company Name: Phillips Pipe Line Company
Address: 400 East Columbus Drive, East Chicago, Indiana 46312
Permit No.: T089-16208-00326
Reviewer: Adeel Yousuf / EVP
Date: May 15, 2003

Emissions Factors for Internal Combustion Engines

	Diesel (lb/hp-hr)	Gasoline (lb/hp-hr)
NOx	0.0310	0.0110
SO2	0.0021	0.0006
CO	0.0068	0.4390
PM	0.0022	0.0007
VOC	0.0025	0.0150

Each of the listed engines qualify as an insignificant activity with maximum annual operation of 500 hours

				Emissions (tons/yr)				
Emission Unit ID	**Name (fuel)**	**Size (hp)**	**Anuual Hours in Service**	**NOx**	**SO2**	**CO**	**PM**	**VOC**
IC-1	Fire Pump (Diesel)	32	500	0.25	0.02	0.05	0.02	0.02
IC-2	Air Compressor (Diesel)	52	500	0.40	0.03	0.09	0.03	0.03
IC-3	Welding Machine (Diesel)	32	500	0.25	0.02	0.05	0.02	0.02
IC-4	Vaccum Wagon (Diesel)	18	500	0.14	0.01	0.03	0.01	0.01
IC-5	Port. Generator (Diesel)	7	500	0.05	0.00	0.01	0.00	0.00
IC-6	Water Blaster (Gasoline)	7	500	0.02	0.00	0.77	0.00	0.03
Total				1.11	0.08	1.01	0.08	0.11

Note:
Emission factors used are from AP-42, Table 3-3.1